

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-HB

This Document Relates To:
ALL COMMERCIAL AND
INSTITUTIONAL INDIRECT
PURCHASER PLAINTIFF ACTIONS

**DECLARATION OF SARAH STERLING STARNS IN SUPPORT OF COMMERCIAL
AND INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION TO
APPOINT TOSTRUD LAW GROUP, P.C.; ZIMMERMAN REED LLP; BARRETT
LAW GROUP, P.A.; AND BOZEMAN LAW FIRM, P.A. TO
PLAINTIFFS' STEERING COMMITTEE**

I, Sarah Sterling Starns, declare:

1. My statements contained herein are based on my personal knowledge.
2. I am an attorney licensed to practice law in the State of Mississippi, and I am a partner of Barrett Law Group, P.A ("BLG"), a law firm headquartered in Lexington, Mississippi. BLG is one of the very few firms in the deep South which specializes in antitrust litigation, and the inclusion of BLG on the proposed Plaintiffs' Steering Committee would meaningfully add to the gender and geographical diversity of the attorneys expected to play meaningful and substantial roles in the work of the committee.
3. Outside of my practice with BLG, I serve as municipal court judge for the City of Lexington, Mississippi, since January 2017. In this capacity, I handle misdemeanor criminal cases, including holding trials, as well as conducting initial appearances and preliminary hearings.
4. Upon appointment to a Plaintiffs' Steering Committee, myself, Katherine Barrett Riley, and David McMullan of BLG, are ready, willing, and able to continue to take on

responsibility, at the direction of lead counsel, for coordinating the activities of the Commercial and Institutional Indirect Purchaser Plaintiffs (“CIIPPs”) during pretrial proceedings and supervising the day-to-day management of the case, including coordinating, organizing, and handling the following activities for the Committee:

- Presenting to the Court and opposing parties the position of CIIPPs on matters arising during pretrial proceedings;
- Coordinating and conducting discovery on behalf of CIIPPs consistent with the requirements of the Federal Rules of Civil Procedure relating to discovery or any other subsequent order of the Court;
- Conducting settlement negotiations on behalf of CIIPPs, to the extent expressly authorized;
- Delegating specific tasks to other counsel in a manner to ensure that pretrial preparation for CIIPPs is conducted effectively, efficiently, and economically;
- Entering into stipulations with opposing counsel as necessary on issues relating to the litigation;
- Preparing and distributing periodic status reports to the parties;
- Monitoring the activities of CIIPPs designated counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided; and
- Performing such other duties as may be incidental to the proper coordination of CIIPPs pretrial activities or as authorized by further Order of the Court.

5. I have worked closely with co-lead counsel Jon Cuneo and Shawn Raiter in other matters, including *In Re: Automotive Parts Antitrust Litigation*, No. 2311, pending before Judge Marianna Battani in the Eastern District of Michigan, one of the largest price-fixing conspiracies in history. My responsibilities representing automobile dealerships in *Auto Parts* have been substantial and included, among other things, attending and taking depositions, conducting witness interviews, and assisting in briefing complex legal issues.

6. BLG, Cuneo, Gilbert & LaDuca, LLP, and Larson · King, have also worked together collaboratively on litigation on behalf of a class of commercial indirect purchasers in *In re Packaged Seafood Products Antitrust Litig.*, No. 3:15-md-02670-JLS-MDD (S.D. Cal.). As a result of the firms' efforts, the court in *Packaged Seafood* issued an order granting class certification, which is currently under appeal pursuant to Fed. R. Civ. P. 23(f). *See Packaged Seafood*, No. 15-md-2670, Dkt. No. 1931.

7. I am also currently working with Cuneo, Gilbert & LaDuca, LLP, Larson · King, and the Tostrud Law Group in *In re Generic Pharmaceuticals Pricing Antitrust Litig.*, No. 2:16-md-02724 (E.D. Pa.). As a result of the involvement of BLG in this matter, I am working with lead counsel on behalf of the indirect reseller plaintiffs in gathering client information for discovery purposes and resolving discovery disputes. Depositions in this matter began to take place this January, and I am the indirect reseller plaintiff group representative on several inter-plaintiff group deposition preparation teams.

8. I have also undertaken significant responsibilities in other instances in which BLG has successfully led complex, affirmative litigation. I was appointed co-lead counsel for plaintiff trucking firms from around the nation in a class action against the Pilot/Flying J truck stop group over alleged rebate under-payments to the truckers concerning the purchase of diesel fuel. *See Nat'l Trucking Fin. Reclamation Servs., LLC v. Pilot Corp.*, No. 4:13-cv-00250, Dkt. No. 46 at 3 (E.D. Ark. 2013). BLG achieved a settlement of 106% of all under-payments, plus all costs and fees of the litigation. Payments approached \$85 million; the final approval was given November 25, 2013, by the U.S. District Court in Little Rock, Arkansas. As part of the leadership role of in this matter, I assisted in preparing pleadings, coordinating notice to class members, and helping class members submit claims to the claims administrator where needed.

9. Other relevant experience includes assisting co-lead counsel in representing a national class of direct purchasers of dairy products in *First Impressions Salon, Inc. v. National Milk Producers Federation*, No. 3:13-cv-00454, in the Southern District of Illinois. Don Barrett of BLG, was appointed as co-lead counsel, and helped effectuate a \$200 settlement million on the eve of trial, and the Court gave final approval to this settlement on April 27, 2020. I supported Mr. Barrett in this matter by preparing motions and pleadings, presenting discovery disputes to the court, attending depositions, and analyzing the admissibility of evidence.

I affirm under penalty of perjury on this 4th day of March 2021 that the foregoing is true to the best of my knowledge.

By: /s/ Sarah Sterling Starns
Sarah Sterling Starns